

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WASHINGTON MUTUAL BANK,

Plaintiff,

v.

DAN W. ADAMS, HEIDI K. ADAMS,
UNITED STATES OF AMERICA,
COMMONWEALTH OF
MASSACHUSETTS DEPARTMENT OF
REVENUE, DELTA FUNDING
CORPORATION and BENEFICIAL
MASSACHUSETTS INC.,

Defendants.

REQUEST FOR DEFAULT

I, Mary Ellen Manganello, attorney for the above-named plaintiff, Washington Mutual Bank, (“Washington Mutual”), pursuant to Fed. R. Civ. P. 55, state that the Complaint in which a judgment for affirmative relief is sought against the defendants, Dan W. Adams and Heidi K. Adams, collectively (“Adams”) herein, was filed on August 15, 2005. The summonses and a copy of the complaint were served on Adams on August 18, 2005, as appears from the officer’s returns filed with this court. The time within which Adams were granted to serve a responsive pleading, or otherwise defend, has expired and Adams herein have failed to serve or file an answer or otherwise defend the Complaint.

WHEREFORE, Plaintiff makes application that Adams be defaulted.

Respectfully Submitted,

WASHINGTON MUTUAL BANK,
By its attorneys,

/s/ Mary Ellen Manganelli
Donn A. Randall (BBO #631590)
J. Patrick Kennedy (BBO #565778)
Mary Ellen Manganelli (BBO #641658)
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Dated: September 9, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the defendants, Dan W. Adams and Heidi K. Adams by mail on September 9, 2005.

/s/ Mary Ellen Manganelli
Mary Ellen Manganelli